



February 24, 2022

**FILED VIA ECF**

The Hon. Gregory H. Woods  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *Torretto et al. v. Donnelley Financial Solutions, Inc. et al.*, Case No. 1:20-cv-02667-GHW,  
Letter Requesting Stay and Extension of Deadlines

Dear Judge Woods:

We represent the Plaintiffs in the above-referenced action and write, jointly with Defendants' counsel, to inform the Court that the parties are close to reaching an agreement on the materials class terms of a settlement that will resolve all claims in this litigation. To provide time to negotiate and finalize the settlement terms, the parties jointly request a stay of all pending deadlines as set forth below.

On February 4, 2022, the Court entered an order granting in part and denying in part Defendant Mediant Communications, Inc.'s Rule 12(b)(6) motion to dismiss and granting Defendant Donnelley Financial Solutions, Inc.'s Rule 12(b)(6) motion to dismiss, and providing Plaintiffs leave to replead the dismissed claims. Doc. 127. On February 18, 2022, the Court ordered that any amended complaint must be filed by February 28, 2022. Doc. 128. The Court also ordered the parties to submit a proposed case management plan by March 11, 2022, and set a status conference for March 18, 2022.

The parties respectfully request that the Court stay this Action in its entirety and propose that this Court set a deadline of March 25, 2022 for the Parties to file a Joint Status Report, notifying the Court of the status and/or outcome of the Parties' settlement negotiations. The parties request this stay to preserve the parties' and the Court's resources, to avoid burdening the Court and parties with potentially unnecessary filings and motion practice, and to allow the parties time to finalize the amicable resolution of this action.

Respectfully submitted,

Austin Moore